



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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THOMAS V. SKINNER, DIRECTOR

August 3, 2000

EPA Region 5 Records Ctr.



362863

Mary Jo Anzia, P.E.
Senior Manager
Environ, Suite 150
650 Dundee Road
Northbrook, Illinois 60062

Re: 1358070001-- Montgomery County
Hillsboro/Eagle Zinc
Superfund/Technical Report

Scope of Work for the Remedial Investigation/Feasibility Study

Dear Ms. Anzia:

The Illinois Environmental Protection Agency (IEPA) has reviewed and below provided comments on Environ's initial Scope of Work (SOW) outline for the Eagle Zinc site. As was requested by the IEPA, Environ's initial SOW outline proposal was for an Engineering Evaluation/Cost Analysis (EE/CA). Environ's submittal for the SOW outline was generally adequate and acceptable for an initial draft EE/CA SOW outline, however there was a few omissions from what the IEPA had initially anticipated would be necessary to meet the requirements for an EE/CA. Additionally, Environ included some very specific proposals and details (e.g., number of soil borings, depth of soil samples, and depth of proposed soil cover) that would be premature for inclusion in the SOW, unless they were designated as needed for scoping and site characterization or for early/interim actions. However, the IEPA believes that this was a good effort by Environ to provide an initial EE/CA SOW.

In addition to the IEPA's review comments on Environ's EE/CA SOW submittal, the Agency has attached to this letter the following information:

1. Basic Information on the presumptive remedy procedures for an RI/FS.
2. Information on specific presumptive remedy procedures for metals-in-soil sites that may apply to the Eagle Zinc Site.
3. An example model RI/FS SOW.

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GEORGE H. RYAN, GOVERNOR

REVIEWER MD

4. Information on and an early/interim response measures potential list.
5. Information on streamlining for the presumptive remedy RI/FS.
6. An example metals-in-soil SOW for a presumptive remedy RI/FS.

Remediation Procedural Options and Changes for the Requested Scope of Work

Although the submitted SOW outline met many of the EE/CA requirements it was not adequate to meet the majority of the requirements of a Remedial Investigation/Feasibility Study SOW and it was not expected to at that time. However, earlier this calendar year the U.S. EPA informed the Illinois EPA that the EE/CA remediation option has been eliminated.

As we have informed Environ and Eagle Zinc by telephone, the U.S. EPA in eliminating the EE/CA procedure for use in addressing contamination at NPL sites has resulted in unexpected complications in developing a SOW for the Eagle Zinc site. After considerable research and review the IEPA has determined that although a Remedial Investigation/Feasibility Study (RI/FS) is the only general option presently acceptable to the U.S. EPA for NPL sites, the RI/FS process can be focused or streamlined using Presumptive Remedies.

The U.S. EPA's presumptive remedy RI/FS is similar in many ways to an enhanced EE/CA. However, as originally presented by Environ, the initial SOW does not include all of the tasks and requirements needed for a streamlined RI/FS using a presumptive remedy. The necessary information for Environ to produce a SOW for a presumptive remedy RI/FS can be found in numerous U.S. EPA directives and guidance documents listed below. Also, the IEPA has attempted herein to summarize the applicable presumptive remedy directives and provide the basic direction, structure, and details for the presumptive remedy RI/FS SOW. The initial draft EE/CA can be used in developing early or interim response actions for the Site.

It is the IEPA's intent to work with Environ and the Potential Responsible Parties (PRPs) to readily bridge any requirement gaps or differences between the EE/CA and the presumptive remedy procedures and requirements allowed for the streamlining of the RI/FS process. The IEPA has determined that the previously submitted EE/CA SOW outline can be integrated into a more developed presumptive remedy SOW. With the appropriate modifications and additions to the previously submitted EE/CA SOW outline, the IEPA believes that the outline can be enhanced so that the focused or streamlined Presumptive Remedy RI/FS requirements will be met.

The IEPA has made this determination after reviewing the various presumptive remedy guidance and directive documents that are available for the U.S. EPA Superfund/CERCLA program. The IEPA has included below a partial list of U.S. EPA

directives and related guidance documents to be used for the SOW and the Presumptive Remedy RI/FS process. In addition, I have included some basic information on the general use of Presumptive Remedies and the more specific use of Presumptive Remedies for metals in soils, groundwater contamination, and CERCLA municipal landfill sites (information on waste cover systems).

The presumptive remedy directives appear in some instances to duplicate the EE/CA process, and/or bridge it to the more extensive requirements for a regular, non-streamlined RI/FS. In either case, the presumptive remedies for metals-in-soil, and for contaminated groundwater allows for a focused RI/FS, that can be streamlined. If the metals-in-soil presumptive remedies are also coupled to certain appropriate and applicable procedures, such as the CERCLA municipal landfill presumptive remedy guidance, then this appears to result in a streamlined and focused RI/FS that is very similar to an enhanced EE/CA approach.

Specific Presumptive Remedy Guidance and Directive Documents

In addition to the guidance documents that Environ included in their initial February 2000 SOW outline, the following guidance documents should be reviewed and used where applicable:

1. *Presumptive Remedy for Metals-in-Soils Sites* (EPA540-F-98-054, September 1999)
2. *Presumptive Response Strategy and Ex-Situ Treatment Technologies for Contaminated Ground Water at CERCLA Sites* (EPA 540/R-96/023, October 1996)
3. *Presumptive Remedies: CERCLA Landfill Caps RI/FS Data Collection Guide* (EPA/540/F-95/009)

The IEPA believes that the above listed directives, especially the Metals-in-Soil document, provide very useful information for the presumptive remedy RI/FS SOW, early/interim response actions, and for the presumptive remedy RI/FS Work Plans

Presumptive Remedy Types

The U.S. EPA has developed presumptive remedy directives and guidances for the following five types of sites:

- Metals-in-Soils
- VOCs in Soils
- Contaminated Ground Water
- Wood Treaters
- Municipal Landfills

After Environ and Eagle Zinc have had an opportunity to review the IEPA's letter and attachments, a conference call and meeting will need to be schedule. The IEPA would like to schedule the conference call for the week of August 28, 2000.

If you have any comments or questions, please telephone at the above number. Thank you.

Sincerely,

A handwritten signature in cursive script, reading "Rick Lanham", followed by a horizontal line.

Rick Lanham, Project Manager
NPL Unit
Federal Site Remediation Section
Bureau of Land

Attachments

cc: Lois Kimbol